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3 HOOTAN BAIGMOHAMMADI, SBN 279105
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10 Attorneys for Defendant
11 Mr. Wilson

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13 IN THE UNITED STATES DISTRICT COURT
14 FOR THE EASTERN DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,) Case No. 2:21-cr-155-JAM
16 Plaintiff,)
17 vs.) **STIPULATION AND ORDER TO CONTINUE**
18 JOSHUA WILSON and) **STATUS CONFERENCE AND EXCLUDE TIME**
19 CODY CRAMER,)
20 Defendants.)
21 Date: September 27, 2022
22 Time: 9:30 a.m.
23 Judge: Hon. John A. Mendez

24 IT IS HEREBY STIPULATED and agreed by and between United States Attorney
25 Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for
26 Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan
27 Baigmoammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody
28 Cramer that the status hearing currently set for September 27, 2022 at 9:30 be continued to
December 6, 2022 at 9:00 a.m.

The parties specifically stipulate as follows:

- 29 1. By previous order, this matter was set for a status on September 27, 2022 at 9:30
30 a.m.
- 31 2. By stipulation, Mr. Wilson now moves to continue the status conference to
32 December 6, 2022 at 9:00 a.m.

- 1 3. To date, the government has produced approximately 850 pages and various
- 2 audio/video recordings of discovery to the defendants.
- 3 4. Mr. Wilson and Mr. Cramer require additional time to review the discovery,
- 4 investigate and research possible defenses, research potential pretrial motions, and
- 5 explore potential resolutions to the case, and otherwise prepare for trial.
- 6 5. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance
- 7 would deny them the reasonable time necessary for effective preparation, taking
- 8 into account the exercise of due diligence.
- 9 6. Neither the government nor Mr. Cramer object to the continuance.
- 10 7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial
- 11 Act), the parties request that the time period between September 27, 2022 and
- 12 December 6, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. §
- 13 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance
- 14 granted by the Court at the defense's request, based on a finding that the ends of
- 15 justice served by granting the continuance outweighs the best interest of the
- 16 public, Mr. Wilson, and Mr. Cramer in a speedy trial.

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1 Respectfully submitted,

2 HEATHER E. WILLIAMS
3 Federal Defender

4 Date: September 21, 2022

5 /s/ Hootan Baigmohammadi
6 HOOTAN BAIGMOHAMMADI
7 Assistant Federal Defender
8 Attorneys for Mr. Wilson

9 Date: September 21, 2022

10 /s/ Kyle Knapp
11 Kyle Knapp
12 Attorney for Mr. Cramer

13 Date: September 21, 2022

14 PHILLIP A. TALBERT
15 United States Attorney

16 /s/ James R. Conolly
17 James R. Conolly
18 Assistant United States Attorney
19 Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Date: September 22, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE